

420267



CHARLES H. GOEBEL and SONS, Inc.

100 Sycamore Ave., Folsom, Pennsylvania 19033-1906 • (610) 532-4644 • Fax (610) 532-3013

February 22, 2002

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

FEB 28 2002

RE: Request for Submission of Information directed to Charles H. Goebel & Sons, Inc. in connection with the Lower Darby Creek Area Superfund Site - Clearview Landfill, Folcroft landfill and Folcroft Landfill Annex

Dear Ms. Prisk:

On behalf of Charles H. Goebel & Sons, Inc., I am responding to an Environmental Protection Agency ("EPA") information request dated February 1, 2002. This information request was sent by EPA in connection with the above-referenced superfund site pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. Section 9604(e). The questions contained in Enclosure F to the EPA's February 1, 2002 letter limit the period of time in question to the years 1958 to 1976. The enclosed response sets forth Charles H. Goebel & Sons' answers to EPA's information request. Charles H. Goebel & Sons specifically reserves the right to amend or supplement its response to the information request to the extent that it deems necessary and permitted pursuant to paragraph 4 of Enclosure E to the information request.

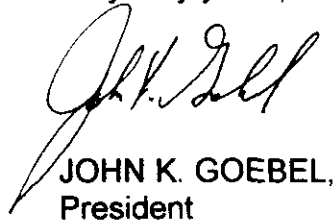
On March 21, 1978, a fire destroyed the business and records of Charles H. Goebel & Sons, Inc. Charles H. Goebel, Sr. owned and operated the business during the period of time in question, but has since died. Accordingly, the information submitted was ascertained from the memories of individuals who worked for the company during the period of time in question. There is some recollection that Charles H. Goebel & Sons, Inc. may have engaged one of the haulers mentioned in the information request for a period of time between 1974 and 1976 to haul its trash.

Charles H. Goebel & Sons, Inc. is unable to conclude that it generated any hazardous waste or that any such waste was transported to and disposed of at the Lower Darby Creek Area Superfund Site.

Ms. Carlyn Winter Prisk
Environmental Protection Agency
Re: Charles H. Goebel & Sons, Inc.
February 22, 2002
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Charles H. Goebel & Sons, Inc. anticipates that the enclosed information satisfies EPA's request. Please do not hesitate to contact me if I can provide you with additional information.

Very truly yours,



JOHN K. GOEBEL,
President

JKG/dh
Enclosure

CHARLES H. GOEBEL & SONS, INC. RESPONSE
TO EPA'S FEBRUARY 1, 2002 REQUEST
FOR INFORMATION PURSUANT TO CERCLA SECTION 104(e)

1. State the name of your company, its mailing address, and telephone number. Further identify:
Charles H. Goebel & Sons, Inc.; 100 Sycamore Avenue, Folsom, PA 19033-1906; (610) 532-4644.
 - a. The dates and states of incorporation of your company;
March 20, 1961; Pennsylvania.
 - b. The date and original state of incorporation of your company; and
March 20, 1961; Pennsylvania.
 - c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.
None.
2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.
Cabinet making; same; no change.
3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.
**John K. Goebel, President Charles H. Goebel & Sons, Inc.;
100 Sycamore Avenue, Folsom, PA 19033; (610)532-4644.
Ronald C. Goebel, Secretary/Treasurer Charles H. Goebel & Sons, Inc.;
100 Sycamore Avenue, Folsom, PA19033; (610) 532-4644.
Charles H. Goebel, Sr.; Former owner and President Charles H. Goebel & Sons, Inc., now deceased.**
4. Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:
Charles H. Goebel, Sr., John K. Goebel, and Ronald C. Goebel.
 - a. The dates of their operation;

Charles C. Goebel, 1961 to 1983.
John K. and Ronald C. Goebel, 1983 to present.

- b. The nature of their operation; and
Charles H. Goebel, Sr., President.
John K. Goebel, President 1983 to present.
Ronald C. Goebel, Secretary/Treasurer 1983 to present.

- c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).

All documentation and written information through March 1978 was destroyed in a six alarm fire that occurred March 21, 1978, which destroyed the building, business and records of Charles H. Goebel & Sons, Inc. Information and documentation does exist for the last 10 years. It is believed that during the period of 1974 to 1976, Tri-County Hauling was used as the business' trash hauler which is one of the entities identified in question 8. They would be called for a dumpster. It would be delivered, filled with trash and the invoices paid. Charles H. Goebel & Sons, Inc.'s waste consists mainly of wood scraps, cardboard and office trash. After reasonable investigation, to the best of its knowledge, Charles H. Goebel & Sons, Inc. possesses no further information or documents responsive to this request.

- 5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.

The respondent possesses no documents or other information responsive to this request because they were destroyed by fire. The documents dealing with the business's waste would have included invoices for the hauling and checks in payment thereof, plus invoices for the goods purchased by the business.

- a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;

Respondent possesses no information responsive to this request, but believes that the information would have included the name of the hauler and cost of the services. Custodian was Charles H. Goebel, Sr., now deceased. Name of vender, identification of goods purchased, date and price.

b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and
None.

c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.
None.

6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:

Paint and stain. Three typical MSDS attached.

a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;
Painting and staining cabinets.

b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;
After reasonable investigation, to the best of its knowledge, Charles H. Goebel & Sons, Inc. has no information regarding the exact chemical composition, characteristics or physical state, except that it would come in liquid form which was then put on the cabinet as part of its finishing process. The liquid stain or paint is put on the cabinet and only the minimal residue in the can which would dry and harden was the waste.

c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;
Used approximately 100 gallons per year.

d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;
Continuously used in the business.

e. The types and sizes of containers in which these substances were transported and stored; and
1 or 5 gallon cans.

f. The persons or companies that supplied each such hazardous substance to your company.
Finnaren & Haley and National Chemical.

7. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:

Wood scraps, cardboard, office trash and the dried and hardened residue of paint or stain in their cans.

- a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;
Cabinet making and general administrative office work.
- b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
Paint or stain. See typical MSDS attached. Charles H. Goebel & Sons, Inc. has no information regarding the chemical composition of such product or waste. Its characteristic and physical state would typically be solid. Charles H. Goebel & Sons, Inc.'s business produces no liquid or gas by-products.
- c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;
Wood scraps, cardboard and office trash. About 6 to 8 dumpsters per year. Paint and stain residue minimal, only the dried and hardened portion remaining in a can after use of the liquid to finish cabinets. After reasonable investigation, to the best of its knowledge, Charles H. Goebel & Sons, Inc. has no information responsive to this request, except that it is believed that between 6 to 8 dumpsters per year may have been used during the period in question which would include the non-hazardous waste of the business and the dry and hardened portion of paint and stain residue in cans.
- d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
Wood, cardboard, office trash, and empty paint and stain cans disposed of in dumpster. Waste dumpsters of varying sizes. Approximately 6 to 8 per year.
- e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
After reasonable investigation, to the best of its knowledge, Charles H. Goebel & Sons, Inc. has no information responsive to this

request, but believes that Tri-County Hauling may have been used between 1974 and 1976.

- f. The location and method of treatment and/or disposal of each such by-product or waste.

After reasonable investigation, Charles H. Goebel & Sons, Inc. has no information regarding the disposal of its waste during the relevant time period.

8. Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckly Trash Hauling, Barratt Rupurt, McCloskey Engineering, ABM Disposal Services, Marvin Jonas, Jonas Waste Removal, Paolino Company, Schiavo Bros., Inc., Gene Banta Trash Removal and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:

Upon information and belief, It is believed Tri-County Hauling was used between 1974 and 1976.

- a. The person with whom you made such a contract or arrangement;
After reasonable investigation, to the best of its knowledge, Charles H. Goebel & Sons, Inc. has no information responsive to this request.

- b. The date(s) on which or time period during which such material was removed or transported for disposal;
Upon information and belief, sometime between 1974 and 1976.

- c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
Charles H. Goebel & Sons, Inc. has no information regarding the chemical contents of such material, but it would include solid wood scraps, cardboard, office trash, and empty paint and stain cans.

- d. The annual quantity (number of loads, gallons, drums) of such material;
6 to 8 dumpsters per year.

- e. The manner in which such material was containerized for shipment or disposal;
Dumpster.

- f. The location to which such material was transported for disposal;
Upon information and belief, Charles H. Goebel & Sons, Inc. understood that the waste hauler utilized to dispose of its waste did so in accordance with all applicable local, state and federal statutes,

**regulations and other laws in effect at the time of their activities.
Charles H. Goebel & Sons, Inc. has no other information responsive to this request.**

- g. The person(s) who selected the location to which such material was transported for disposal;
Hauler.
 - h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
Unknown.
 - i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.
None.
- 9. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:
 - a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas -of the Site;
None from Charles H. Goebel & Sons, Inc.
 - b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or
Charles H. Goebel & Sons, Inc. has no information responsive to this request, although it would believe that the hauler would have made any necessary arrangements.
 - c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.
Charles H. Goebel & Sons, Inc. has no information responsive to this request, although it would believe that the hauler would have made any necessary arrangements.
- 10. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:
After reasonable investigation, Charles H. Goebel & Sons, Inc. has no information regarding the disposal of its waste during the relevant time period.

- a. The date(s) on which such material was disposed of or treated at the Site;
After reasonable investigation, Charles H. Goebel & Sons, Inc. has no information regarding the disposal of its waste during the relevant time period.
 - b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
After reasonable investigation, Charles H. Goebel & Sons, Inc. has no information regarding the disposal of its waste during the relevant time period.
 - c. The annual quantity (number of loads, gallons, drums) of such material;
After reasonable investigation, Charles H. Goebel & Sons, Inc. has no information regarding the disposal of its waste during the relevant time period.
 - d. The specific location on the Site where such material was disposed of or treated; and
After reasonable investigation, Charles H. Goebel & Sons, Inc. has no information regarding the disposal of its waste during the relevant time period.
 - e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.
After reasonable investigation, Charles H. Goebel & Sons, Inc. has no information regarding the disposal of its waste during the relevant time period.
11. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:
Not to the knowledge of Charles H. Gobel & Sons, Inc.
- a. The date(s) the spill(s)/release(s) occurred;
Not applicable.
 - b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
Not applicable.
 - c. The response made by you or on your behalf with respect to the spill(s)/release(s); and
Not applicable.

- d. The packaging, transportation, and final disposition of the materials which were spilled/released.

Not applicable.

12. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

Charles H. Goebel, Sr., now deceased, and the same person identified in answer 3.

13. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

No.

14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

After reasonable investigation, to the best of its knowledge, Charles H. Goebel & Sons, Inc. has no other information which may assist the EPA.

15. Representative of your establishment(s):

- a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.

John K. Goebel, President;

100 Sycamore Avenue, Folsom, PA 19033; (610) 532-4644.

- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

John K. Goebel, President;

100 Sycamore Avenue, Folsom, PA 19033; (610) 532-4644.

16. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

All documents, written information and business records were destroyed in a fire on March 21, 1978.

- a. Your document retention policy;
Currently 10 years.
- b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
Burned by fire which destroyed the building, business and records of Charles H. Goebel & Sons, Inc. on March 21, 1978.
- c. A description of the type of information that would have been contained in the documents; and
Dates, prices, invoices, canceled checks, customers, vendors, payroll records, and general business records.
- d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.
Charles H. Goebel, Sr., now deceased.

CHARLES H. GOEBEL & SONS, INC., INC.

By: _____


John K. Goebel, President

SECTION II HAZARDOUS INGREDIENTS & EXPOSURE LIMITS (cont.)

CHEMICAL NAME	CAS #	%	LIMIT VALUES
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SP. GRAVITY

84742-82-8

6.12

N/A

SECTION III PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point: 148 to 290 deg F.

Vapor Pressure (mm Hg.): No Data

Vapor Density (AIR = 1): heavier than air

Solubility in Water: No Data

% Volatile / Volume: 77

Appearance and Odor: No Data

pH: No Data

Specific Gravity (H2O = 1): 1.00

Miscellaneous Information

Evaporation Rate: Slower than ether.

SECTION IV FIRE AND EXPLOSION HAZARD DATA

Flash Point: 45 deg. F.

Flammable Limits: No Data

Lower Explosive Limit (LEL): 0.90

Upper Explosive Limit (UEL): No Data

Extinguishing Media

Foam, carbon dioxide or dry chemical. Water fog may lessen fire intensity.

Special Fire Fighting Procedures

During emergency conditions, decomposition products can cause health hazard. Use self-contained breathing apparatus with full face shield operated in pressure demand or other positive pressure mode.

Unusual Fire and Explosion Hazards

Keep containers tightly closed. Isolate from heat, electrical equipment, sparks and open flame. Closed containers may explode when exposed to extreme heat. Vapors are heavier than air and may travel along the ground, collect in low areas, or may ignite at distant locations. Do not weld on or near container, even when empty.

SECTION V REACTIVITY DATA

Stable: Yes

Hazardous Polymerization May Occur: No

Conditions to Avoid

Avoid high temperatures, direct heating.

Incompatibility (Material to Avoid)

Avoid contact with strong oxidizing agents.

Hazardous Decomposition or Byproducts

In case of thermal decomposition, carbon dioxide and carbon monoxide will form.

M A T E R I A L S A F E T Y D A T A S H E E T

*Chemveer Sealer (931-0024-00) A
Part #931002400

Guardzman Products, Inc.
145 Divident Road
Rocky Hill, CT 06067
(203) 563-2811

***** HMIS RATINGS *****
Health: 3 Flammability: 3 Reactivity: 0 Pers. Prot. Index:

***** NO NFPA RATINGS *****

SECTION I PRODUCT IDENTITY

Product/Trade Name(s): *Chemveer Sealer (931-0024-00) A
Part Number: 931002400
MSDS Date: 02/16/96
CAS #: N/A
Category: N/A
Distributor: N/A
Chemical Name: N/A
Formula: N/A
Brief Description: Lacquer Coating

SECTION II HAZARDOUS INGREDIENTS & EXPOSURE LIMITS

CHEMICAL NAME	CAS #	%	LIMIT VALUES			
ETHYL BENZENE	100-41-4	2.34	PEL	100 ppm		
			PEL	435 mg/m3		
BUTYL ALCOHOL	71-36-3	3.39	PEL	100 ppm		
			PEL	300 mg/m3		
FORMALDEHYDE	50-00-0	0.14			see 29 CFR 1910.1048	
METHYL ALCOHOL	67-56-1	10.84	PEL	200 ppm		
			PEL	260 mg/m3		
TOLUENE	108-88-3	22.30	8 HOUR TWA	200 ppm	see Table Z-2	
			ACCELY. CEILING	300 ppm	see Table Z-2	
			MAX. PEAK CONC.	500 ppm	see Table Z-1	
			MAX. DURATION	10 minutes	see Table Z-2	
XYLENE	1330-20-7	13.93	PEL	100 ppm		
			PEL	435 mg/m3		
ETHYL ALCOHOL	84-17-5	4.94	PEL	1,000 ppm		
			PEL	1,900 mg/m3		
METHYL ALCOHOL	78-82-1	5.77	PEL	100 ppm		
			PEL	300 mg/m3		

M A T E R I A L S A F E T Y D A T A S H E E T

*Autumn Wiping Stain (925-2164-00) A
Part #925216400 *OL*
329-3062
Guardman Products, Inc.
145 Dividend Road
Rocky Hill, CT 06067
(800) 424-9300

***** HMIS RATINGS *****
Health: 2 Flammability: 1 Reactivity: 3 Pers. Prot. Index:
***** NO NFPA RATINGS *****

SECTION I PRODUCT IDENTITY

Product/Trade Name(s): *Autumn Wiping Stain (925-2164-00) A
Part Number: 925216400
MSDS Date: 02/16/96
CAS #: N/A
Category: Pigment Stain
Distributor: N/A
Chemical Name: N/A
Formula: N/A
Brief Description: HAND WIPING STAIN

SECTION II HAZARDOUS INGREDIENTS & EXPOSURE LIMITS

CHEMICAL NAME	CAS #	%	LIMIT VALUES		
+1,2,4-TRIMETHYLBENZENE	95-63-6	18.78	N/A		
+ALUMINUM OXIDE	1344-28-1	0.08	PEL	15 mg/m3	total dust
			PEL	5 mg/m3	respirable fraction
+TOLUENE	108-88-3	1.87	8 HOUR TWA	200 ppm	see Table Z-2
			ACGHP. CEILING	300 ppm	see Table Z-2
			MAX. PEAK CONC.	500 ppm	see Table Z-2
			MAX. DURATION	10 minutes	see Table Z-2
+XYLENE	1330-20-7	2.75	PEL	100 ppm	
			PEL	435 mg/m3	
CRYSTALLINE SILICA	1317-85-9	0.03	PEL	250 (85102+5)	mppcf (resp. dust)
			PEL	10 (85102+2)	mg/m3 (resp. dust)
			PEL	30 (85102+2)	mg/m3 (total dust)
			see Table Z-2 for an explanation		
CINCHON	98-82-8	0.88	PEL	50 ppm	
			PEL	245 mg/m3	
			use protection to avoid skin exposure		
ALCOHOL-TRICOL C-95	64-17-8	0.13	PEL	1,000 ppm	
			PEL	1,900 mg/m3	